

In The United States District Court For  
The Eastern District Court of Pennsylvania

Andy Ortiz,  
Plaintiff,

v.

C/O: S. BlackSheer

C/O: A. Jones

Defendants,

Plaintiff's First Set of  
Interrogatories To Defendants  
Deposition upon written question  
Civil Action # 21-CV-3101

"Deposition upon written question"

In Accordance with Rule 33 of the Federal Rules of Civil procedure, Plaintiff requests that Defendant Correctional Officer's C/O: S. BlackSheer and C/O: A. Jones answer the following interrogatories under oath, and that the answers be signed by the person making them and be served on plaintiff within 30 days of service of these interrogatories.

If you can not answer the following interrogatories in full, after ~~you~~ exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

These interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes.

1.) Both Defendants to state they first, middle, last name given to them at birth?

2.) Do Both Defendants remember the incident, plaintiff claims took place in the plaintiff complaint? If so, what do you remember or can recall?

3.) Where Both Defendants aware of grievances, reports, memorandum, ~~statements~~ statements at any point in time filed against them by the plaintiff on his claims he reports in this suit?

4.) Where the Defendants ever disciplined at any point of time thru out the daily lives? why, and for what reason if any?

5.) Please provide the names and address or otherwise identify and locate any person plaintiff claims to know of facts relevant to the conduct ~~described~~ described in his claims or interrogatories?

6.) Did Defendants put plaintiff in an unsafe incident or problem that plaintiff's right where violated due to failure to protect because plaintiff had to protect him self?

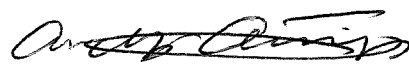
Cc Filed on 7-10-23

- 1.) personal copy
- 2.) EASTERN DISTRICT
- 3.) WAS NOT ABLE TO GIVE A COPY TO DEFENDANT'S LAWYERS.

- 7.) If plaintiff was to set up a deposition to ask defendant's questions under oath would you tell the truth even if deep down you know you are guilty?
- 8.) Did you have any motive or intentions on conducting any type of wrongful action against plaintiff?
- 9.) Did you tell any inmates on the pod/unit where incident happen that plaintiff was telling that cause inmates to attack plaintiff?
- 10.) Did you ever give up any personal information like plaintiff's addresses or phone #s or charges that plaintiff was incarcerated for to any inmates?
- 11.) After a legal visit that plaintiff have with P-I-L-P at any time did you retaliate against plaintiff any form or fashion?
- 12.) DID defendant's open the door to plaintiff cell to let two inmates to attack plaintiff if so, why?
- 13.) Did defendant's have a good relationship with plaintiff if yes or no why?
- 14.) Do you follow the rules that are provided to the employee's that work in the Philadelphia Dept. of prisons?
- 15.) If camera footage is found would you provide it to the courts?
- 16.) The day before, ~~before~~ plaintiff gotten punched or smack in the face ~~in~~ in the yard did defendant Clo:A. Jones go up to that cell #19 to state plaintiff told on defendant's?
- 17.) Did defendant's ever have any type of favorites on treating favorite inmates different from others?
- 18.) Do defendant have any lawsuit or reported misconduct or bad behavior while, employed at a job or ect?
- 19.) Did Eric McDaniel and Donte Parker have a separation from each other if so, when did the separation expire?
- 20.) During ~~before~~ plaintiff reported the ~~incident~~ incident's was both defendant's aware of the reports plaintiff made in the prison plaintiff was confined?
- 21.) Do defendant's have a mental health history if so, what where the diagnosis or treatment?
- ~~22.~~ 22.) Do defendant's ever had a bad behavior reported in the past?
- 23.) Did defendant's HAVE INMATE PASS OUT MAIL OUT BEFORE?
- 24.) DID DEFENDANT'S HAVE EVER HAD INMATE'S GO INTO EACH OTHER CELL'S THAT DIDN'T BELONG THERE?
- ~~25.~~ 25.) DID DEFENDANT'S EVER PROMOTED VIOLENTS?

\* I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED AT SOMERSET, PA ON 7-10-23

  
ANDY ORTIZ

